

EXHIBIT N - IEEO Policy



5-6 Internal EEO Complaint Process



(Last Revised 11 Oct 2015)

Policy

FedEx Express provides a procedure for handling employee allegations of employment discrimination.

An employee's right to participate within the guidelines of the process is guaranteed, although the outcome is not ensured to be in the employee's favor.

Scope

All employees may use the internal EEO Complaint process, regardless of whether they are subject to a collective bargaining agreement.

Guidelines for the Internal EEO Process

Initiating an Internal EEO Discrimination or Harassment Complaint

All allegations of discriminatory employment practices are subject to the internal EEO process. Such allegations include those involving sexual harassment and those based on an employee's race, color, sex, pregnancy (including childbirth or a related medical condition), sexual orientation, gender identity, gender expression, marital status, genetic information, religion, national origin, citizenship, age, disability, military leave or service, status as a disabled veteran or other covered veteran status, participation in EEO protected activity, or any other status protected by federal, state, or local law, or association with a person on the basis of one or more of the foregoing.

Employees who wish to initiate an internal employment discrimination or harassment complaint should discuss their concerns with a member of management, HR, or HR Compliance, but may submit an Internal EEO Employee Packet without doing so. Internal EEO Employee Packets are available from a member of management, HR, HR Compliance or on-line on the HR Compliance website. All complaints will be promptly investigated in as confidential a manner as possible. If the complaint is submitted to a member of management, copies should be forwarded to the matrix HR Advisor/Representative/management and HR Compliance within 48 hours.

Employees are protected by the Company and federal statutes from coercion, intimidation, retaliation, interference, or discrimination for filing a complaint or assisting in a complaint. FedEx Express specifically prohibits such action on the part of its management and other employees.

Before the resolution of any discrimination or harassment complaint, an employee may not be involuntarily transferred, reassigned, or subjected to any punitive action without concurrence of the matrix HR management, HR Compliance, and the Legal Department.

The Internal EEO Process

The internal EEO discrimination or harassment complaint procedure is a 1-step process that requires specific actions to be performed by specific individuals. See [Table 1](#).

Investigation Responsibilities. The assigned managing director is responsible for the investigation. An investigation is not initiated or discontinued without approval or concurrence from the Legal Department. An email must be received from Legal before investigating or taking any disciplinary actions on all employment discrimination issues. The managing director may designate specific duties to matrix HR and/or another member of management. The managing director is responsible for the content of the report and accountable for meeting the timeframes in the process.

Final Decisions. All decisions relating to employment discrimination complaints are final. However, no employee is prohibited from exercising his right to file a charge or participate in an administrative investigation or proceeding.

For more information on the employment discrimination complaint process, contact the HR Compliance Department or the matrix HR Advisor/Representative.

Maintaining Communication

Employees must keep management and HR Compliance advised of any change in their address or telephone number to maintain communication and timeliness throughout the internal EEO process.

Confidential Communications/ Documents

All internal documents, including emails, investigative notes and materials generated in the course of the internal EEO process, including without limitation, internal EEO and harassment investigations are confidential and subject to various legal privileges against disclosure. Circulation, distribution, or discussion of this information is strictly limited to those who have a need to know its content. Written or oral release of the contents of this information beyond this limited circulation must be approved by the Legal Department.

Printed or other static representations of this document are classified "for reference only."

Related Policies

- [5-15 External EEO Complaint Investigation](#)
- [5-35 Disabled Individuals](#)
- [5-40 Open Door](#)
- [5-55 Anti-Harassment](#)

Table 1
Internal EEO Discrimination or Harassment Complaint Process

REQUIRED ACTION		TIMEFRAME
Management Review		
Complainant		
<ul style="list-style-type: none"> • Discusses concerns with management, HR, or HR Compliance Department and obtains an Employee Packet. • Submits Employee Information/Statement forms to management, HR, or the HR Compliance Department. An employee may submit an Employee Packet without first discussing concerns. 		<p>As soon as possible following alleged discrimination</p> <p>Note: While it is not always possible to conform to the time frames listed, it is strongly encouraged that they be followed.</p>
All FedEx Express Management, all Matrix HR Advisors/Representatives, HR Compliance		
<ul style="list-style-type: none"> • Upon receipt of discrimination or harassment complaint, provides the employee with an Employee packet and obtains a signed statement, if possible. 		Immediately (same day)
All FedEx Express Management, all Matrix HR Advisors/Representatives		
<ul style="list-style-type: none"> • Forwards complaint and documentation to the HR Compliance Department in Memphis. <p>Note: An investigation should not begin until an email is received from the Legal Department.</p>		Immediately upon receipt (same day)
HR Compliance		
<p>Upon receipt of a complaint</p> <ul style="list-style-type: none"> • Requests an email from Legal approving or denying initiation of an investigation. • Determines what information/documentation should be gathered. • Identifies appropriate individual, e.g., managing director or matrix HR Advisor/Representative, to facilitate investigation. 		Immediately upon receipt
Managing Director or Designee or Matrix HR Advisor/Representative		
<p>Upon receipt of an email from Legal</p> <ul style="list-style-type: none"> • Holds conference or meeting with the Complainant. • Develops appropriate questions in response to employee's allegations and conducts investigation. • Secures necessary documentation and other information as requested by HR Compliance. • Obtains advice from HR Compliance, HR, or Legal departments, as needed. • Submits draft of internal EEO Investigative Report to HR Compliance. 		<p>Within 3 calendar days of receipt of Employee Information/Statement forms and an email from Legal</p> <p>Within 10 calendar days of employee conference/meeting</p> <p>Throughout investigation</p> <p>Within 5 calendar days of completing the investigation</p>

Table 1
Internal EEO Discrimination or Harassment Complaint Process (Continued)

REQUIRED ACTION	TIMEFRAME
HR Compliance and Legal	
<ul style="list-style-type: none"> Reviews Investigative Report and directs further investigation and interviews as necessary. Provides approval of Investigative Report draft and recommended resolution of the complaint. <p>Note: In the event there are resolution difficulties at this step, the HR Compliance Department, in conjunction with Legal and HR, determines the appropriate remedy consistent with Company policy and applicable EEO laws and regulations. If resolution difficulties remain, the chief HR officer and Senior Vice President, Litigation and Employment will make the final decision.</p>	Within 3 calendar days of receipt
Managing Director or Designee/Matrix HR Advisor/Representative	
<ul style="list-style-type: none"> Submits final approved internal EEO Report with supporting documentation to vice president/senior vice president with a copy to HR Compliance and HR or managing director, as appropriate. Notifies Complainant in writing of closure with copies to HR Compliance and HR. Forwards closed internal EEO file to the HR Compliance Department for retention. Submits letter confirming implementation of corrective actions (when recommended) to vice president with copies to HR Compliance and HR. <p>Note: All of the above should occur within 45 calendar days from the start of the investigation, unless an extension is provided. The Complainant must be advised, by the investigator, of the extension.</p>	Within 5 calendar days of receipt of approved report
HR Compliance	
<ul style="list-style-type: none"> Submits closure form to Legal. Submits a follow-up memo to the vice president/senior vice president with copies to managing director, if confirmation of implementation has not been received within 5 days of closure. 	Upon receipt of closure letter

Note: If an employee receives discipline as a result of the internal EEO investigation, the employee may proceed to Step 2 of the GFTP as outlined in [Table 1](#), of policy 5-5.